



PHILADELPHIA
REGIONAL OFFICE

UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
ONE PENN CENTER, 1617 JOHN F. KENNEDY BLVD., SUITE 520
PHILADELPHIA, PA 19103-1844

June 1, 2022

Via ECF

The Honorable Victor Marrero
United States District Judge
Southern District of New York
Suite 1610
United States Courthouse
500 Pearl Street
New York, New York 10007

Re: Securities and Exchange Commission v. Joublin, Case No. 22-cv-4397-VM (S.D.N.Y.)

Dear Judge Marrero:

Plaintiff Securities and Exchange Commission (the “Commission”), joined by defendant Hugues Pierre Joublin (“Joublin”), respectfully seeks approval of the parties’ proposed consent judgment (the “Proposed Judgment”). The Commission files along with this letter the Proposed Judgment and Joublin’s consent to its entry. If entered, the Proposed Judgment would implement a settlement between the parties that fully resolves the Commission’s claims against Joublin in this action.

The Proposed Judgment is fair and reasonable and in the public interest. *See, e.g., SEC v. Citigroup Global Markets, Inc.*, 752 F.3d 285 (2d Cir. 2014) (setting out standard for reviewing proposed consent judgments in government enforcement actions). Among other things, the Proposed Judgment would order Joublin to pay disgorgement in the amount of \$4,995, prejudgment interest thereon in the amount of \$619.36, and a civil penalty in the amount of \$4,995.

If the Court approves the Proposed Judgment, the Commission respectfully requests that the Court docket the executed Judgment with the consent attached.

Respectfully Submitted,


Christopher R. Kelly

Enclosures

cc: Michael K. Lowman, Esq. (via email)